

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
WORCESTER DIVISION

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)  
ROBERT N. HARRINGTON, )  
Plaintiff, )  
)  
v. ) CIVIL ACTION NO. 05-40115FDS  
)  
JAMES M. KREIDLER, JR. AND THE )  
TOWN OF WINCHENDON, )  
Defendants. )  
\_\_\_\_\_  
)

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

Now come the parties to this action, by and through their attorneys and hereby submit this Joint Statement Pursuant to Local Rule 16.1.

**A. CASE SCHEDULE:**

1. **Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by **February 17, 2006**.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after **June 23, 2006**.
3. **Fact Discovery – Interim Deadlines.**
  - a. All requests for production of documents and interrogatories must be served by **March 17, 2006**.
  - b. All requests for admission must be served by **August 1, 2006**.

- c. All depositions, other than expert depositions, must be completed by **September 9, 2006**.
- 4. **Fact Discovery – Final Deadline.** All discovery, other than expert discovery, must be completed by **September 9, 2006**.
- 5. **Status Conference.** A status conference will be held on **June 29, 2006**.
- 6. **Expert Discovery.**
  - a. Plaintiff(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by **August 1, 2006**.
  - b. Plaintiff(s)' trial experts must be deposed by **October 2, 2006**.
  - c. Defendant(s)' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by **September 1, 2006**.
  - d. Defendant(s)' trial experts must be deposed by **October 2, 2006**.
- 7. **Dispositive Motions.**
  - 1. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by **October 2, 2006**.
  - 2. Oppositions to dispositive motions must be filed within **45** days after service of the motion.
- 8. **Pretrial Conference.** A pretrial conference will be held **during the first week of December, 2006**.
- 9. The parties agree that neither the Plaintiff nor the Defendants shall conduct more than 12 depositions without seeking leave of Court, which leave shall be granted for good cause shown.
- 10. The parties agree that neither the Plaintiff nor the Defendants shall propound more than thirty (30) interrogatories to any party without seeking leave of Court, which leave shall be granted for good cause shown.

11. The parties agree that neither the Plaintiff nor the Defendants shall propound more than seventy-five (75) requests for admissions to any party without seeking leave of Court, which leave shall be granted for good cause shown.

**B. MAGISTRATE:**

The Parties do not consent to the trial of this action by a Magistrate Judge.

Respectfully submitted,  
Robert N. Harrington,  
By his Attorney,

/s/ L. Richard LeClair, III

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Respectfully submitted,  
James M. Kreidler, Jr. and  
Town of Winchendon,  
By their Attorney,

/s/ Leonard H. Keston

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